



OFFICE OF THE  
PRESIDENT

UNIFORMED SERVICES UNIVERSITY OF THE HEALTH SCIENCES  
4301 JONES BRIDGE ROAD  
BETHESDA, MARYLAND 20814-4799



PPM-001-99

SUBJECT: Controlled Substances and Alcohol Inventory Board Instruction

MAR 24 1999

References: *See Enclosure 1*

**A. Purpose.** This President Policy Memorandum (PPM):

1. Establishes policies pertaining to the inventory of controlled substances, alcohol, alcoholic liquors, and anabolic steroids;
2. Ensures proper storage and accountability procedures in accordance with USUHS Instruction 6404<sup>a</sup>, Federal, and local Regulations; and
3. Complies with 21 CFR, Volume 9, Chapter II<sup>b</sup>.

**B. Applicability.** The provisions of this PPM are applicable to all USUHS and Henry M. Jackson Foundation for the Advancement of Military Medicine (HMJF) personnel planning on or engaging in work involving controlled substances, alcohol, alcoholic liquors, and anabolic steroids. Under Public Law 91-513<sup>c</sup>, virtually every person who legitimately handles controlled substances is subject to regulation by the Federal Drug Enforcement Administration (DEA).

**C. Policy.** It is USUHS policy that controlled substances, alcohol, alcoholic liquors, and anabolic steroids will be:

1. Secured against theft or abuse;
2. Accounted for in accordance with this PPM and applicable Federal Regulations; and
3. Protected against trafficking or unauthorized distribution or use.

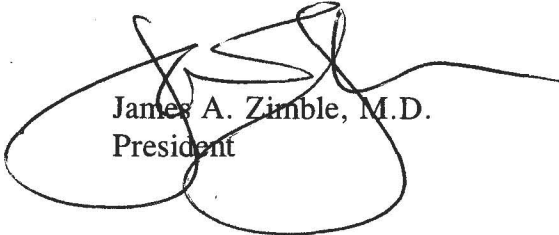
**D. Responsibilities.** The Controlled Substance and Alcohol Inventory Board (CSAIB) shall be composed of at least nine members, appointed by the President, USUHS, of which at least a minimum of three will be faculty members. The Director, Office of Review and Evaluation (DRE), the Pharmacy Officer, and the Director of Security (SEC) are ex-officio, non-voting members.

1. The Controlled Substance and Alcohol Inventory Board Chair shall provide a written report to the President, USUHS, through the Vice President, Teaching and Research Support (TRS) to include the results of all inventories accomplished, highlighting any discrepancies noted. Reports of the annual completed inventories will include a statement regarding the adequacy of the control and security of the controlled forms and substances. Copies of all reports will be provided to the Vice President, TRS, the DRE, and the University Pharmacy Officer.

2. The Controlled Substance and Alcohol Inventory Board shall:

- a. Review all USUHS academic and administrative departments, and the Pharmaceutical Supply Department, inventory forms for controlled substances, and anabolic steroids, and all Bureau of Alcohol, Tobacco, and Firearms (ATF) alcohol utilization logs. An annual, announced inventory of controlled substances, anabolic steroids, alcohol, and alcoholic liquors will be conducted;
- b. Conduct random, unannounced, spot-checks of department inventory records throughout the year at the discretion of the CSAIB; and
- c. Ensure that each department Controlled Substance Custodian has been appointed to this position in writing and further approved by the Pharmacy Officer.

**E. Inventory and Inspection Procedures.** *See Enclosure 3.*

  
James A. Zimble, M.D.  
President

Enclosures:

1. References
2. Inventory and Inspection Procedures

**REFERENCES**

- (a) USUHS Instruction 6404, "Management of Controlled Substances, Alcohol and Alcoholic Liquors, Syringes, Hypodermic Needles, Precursor/Essential Chemicals, and Anabolic Steroids," dated June 28, 1991
- (b) Title 21 Code of Federal Regulations, Volume 9, Chapter II, "Drug Enforcement Administration, Department of Justice"
- (c) Public Law 91-513, "Comprehensive Drug Abuse Prevention and Control Act of 1990."

## INVENTORY AND INSPECTION PROCEEDURES

### Inventory

1. Inventories of controlled substances, anabolic steroids, alcohol, and alcoholic liquors will be accomplished by the Controlled Substance and Alcohol Inventory Board as follows:

a. Inventories will be conducted to ensure that each item is properly accounted for and dutifully recorded on either the individual inventory sheet or log and the quantity is recorded in the appropriate units (i.e., grams, milliliters, pints, etc.). Bulk stock amounts will be distinguished from small working volumes; and

b. Controlled substance inventory forms will be reviewed using the assigned consecutive, individual registry number.

2. Prior arrangements should be made with the Pharmacy Officer and Pharmacy Technician before bringing in controlled substances through channels other than the normal procurement system (i.e., from another University or drug company, etc.).